



21st Floor  
1251 Avenue of the Americas  
New York, NY 10020-1104

**Scott M. Cooper**  
212.603.6478 tel

scottcooper@dwt.com

July 8, 2021

**Via ECF**

Hon. Taryn A. Merkl  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

Re: *Sheehan v. ConsenSys, Inc.*  
19-cv-04154 (DLI) (CLP)

Dear Judge Merkl:

As counsel for Defendant, we write to report on the status of this case.

Plaintiff's counsel, Jordan El-Hag, reported to the Court on numerous prior occasions (with no supporting documentation) that Plaintiff has been unable to participate in discovery for the last 11 months, and for a total of 14 of the last 17 months. Mr. El-Hag has provided no information or suggestions for a path or timeframe for moving forward with discovery. For its part, Defendant is (and at all times has been) ready to continue discovery.

At the parties' status conference before Chief Magistrate Judge Pollak on January 20, 2021, Mr. El-Hag indicated that Plaintiff was still unable to participate in discovery in the case, with no end in sight. Judge Pollak had suggested then that she might encourage the appointment of a guardian *ad litem* in connection with this case, and instructed Mr. El-Hag to update the Court in 90 days. At the parties' most recent status conference on May 24, 2021, Judge Pollak again sought information from Mr. El-Hag regarding the appointment of Plaintiff's mother as his guardian *ad litem* for purposes of this case. Mr. El-Hag provided no such information in response. Accordingly, at the conclusion of the May 24 conference, Judge Pollak gave Mr. El-Hag 30 days to update the Court in writing about whether or not Plaintiff's mother should be appointed guardian *ad litem*. We have heard nothing since from Mr. El-Hag.

Thank you for your consideration.

Respectfully submitted,

/s/ Scott M. Cooper

cc: Jordan El-Hag, Esq. (*via ECF*)